

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

JOHNNY M. HUNT,)	
)	
Plaintiff,)	
)	
vs.)	Case No. 3:23-cv-00243
)	
SOUTHERN BAPTIST CONVENTION;)	Judge Campbell
GUIDEPOST SOLUTIONS LLC; and)	Magistrate Judge Frensley
EXECUTIVE COMMITTEE OF THE)	Jury Demand
SOUTHERN BAPTIST CONVENTION,)	
)	
Defendants.)	

**PLAINTIFF’S OPPOSED MOTION TO MODIFY CASE MANAGEMENT ORDER TO
EXTEND TIME TO IDENTIFY AND DISCLOSE EXPERT WITNESSES AND
REPORTS**

Pursuant to Rule 16(b)(4) of the Federal Rules of Civil Procedure, Local Rules 6.01(a) and 7.01, and the Court’s Initial Case Management Order (Doc. No. 37), Plaintiff respectfully moves to modify the Case Management Order to extend the deadline for identifying and disclosing expert witnesses and reports (“Expert Discovery Deadline”). For the reasons set forth in the accompanying Memorandum, this Court should grant this Motion.

Additionally, Plaintiff states as follows:

1. Pursuant to paragraph M of the Initial Case Management Order, the existing deadlines are as follows:
 - a. The party bearing the burden of proof on an issue must identify and disclose all expert witnesses and expert reports on or before February 23, 2024.
 - b. The current deadline to complete all fact discovery is March 22, 2024.

- c. The party not bearing the burden of proof on the issue shall identify and disclose all expert witnesses and reports on or before March 29, 2024.
- d. Expert depositions shall be completed by April 26, 2024.
- e. Dispositive motions must be filed no later than June 7, 2024, with responses due within 28 days after the filing of the motion, and optional replies due within 14 days after the filing of the response.
- f. The jury trial is set for November 12, 2024

2. Pursuant to paragraph M of the Initial Case Management Order, the requested extension will still conform to the requirements of Local Rule 16.01(h)(1) that no dispositive motion deadline, including response and reply briefs, shall be later than 90 days in advance of the trial date.

3. Pursuant to paragraph M of the Initial Case Management Order, Plaintiff's counsel sent an email on February 22, 2024 to Counsel for all of the Parties to notify them of Plaintiff's intention to file the instant motion and the requested relief herein. Plaintiff's counsel requested that Counsel for each of the Parties confirm whether they agreed to the extension. Alternatively, if Plaintiff's counsel did not hear back, Plaintiff would understand that the requested extension was opposed. As of the filing of the instant motion, no Counsel for any of the Parties has responded.

Dated: February 22, 2024

Respectfully submitted,

s/ Andrew Goldstein

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CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the foregoing Plaintiff's Opposed Motion to Modify Case Management Order to Extend Time to Identify and Disclose Expert Witnesses and Reports to be electronically filed with the Clerk of the Court on February 22, 2024, using the CM/ECF system, which will automatically serve all counsel of record listed below:

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